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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 BAC HOME LOANS SERVICING, LP,

11 Plaintiffs,

12 vs.

13 STONEFIELD II HOMEOWNERS
14 ASSOCIATION; ANTHEM HIGHLANDS
15 COMMUNITY ASSOCIATION;
16 MONECITO AT MOUNTAIN'S EDGE
17 HOMEOWNERS ASSOCIATION;
18 HERITAGE SQUARE SOUTH
19 HOMEOWNERS' ASSOCIATION, INC.;
20 SIERRA RANCH HOMEOWNERS
21 ASSOCIATION; CORTEZ HEIGHTS
22 HOMEOWNERS ASSOCIATION;
23 SOUTHERN HIGHLANDS COMMUNITY
24 ASSOCIATION; ELKHORN –
25 CIMMARRON ESTATES HOMEOWNERS
26 ASSOCIATION; ELKHORN COMMUNITY
27 ASSOCIATION, a Nevada non-profit
28 corporation; CANYON CREST
ASSOCIATION; LAS BRISAS
HOMEOWNERS ASSOCIATION;
ALIANTE MASTER ASSOCIATION;
MOUNTAIN'S EDGE MASTER
ASSOCIATION; ALESSI & KOENIG, LLC;
ALLIED TRUSTEE SERVICES, INC.;
ANGIUS & TERRY COLLECTIONS, LLC;
ASSESSMENT MANAGEMENT GROUP
INC.; ASSET RECOVERY SERVICES,
INC.; LJS&G,LTD., d/b/a Leach Johnson
Song & Gruchow; HOMEOWNER
ASSOCIATION SERVICES, INC; NEVADA
ASSOCIATION SERVICES, INC.; PHIL
FRINK & ASSOCIATIES, INC.; G.J.L.,
INCORPORATED, d/b/a Pro Forma Lien &

Case No.: 2:11-cv-00167-JCM-RJJ

**STIPULATION, REQUEST AND
ORDER EXTENDING TIME TO
ANSWER OR OTHERWISE RESPOND
TO PLAINTIFF'S COMPLAINT**

(First Request)

1 Foreclosure; K.G.D.O. HOLDING
2 COMPANY, INC., d/b/a Terra West Property
3 Management; RMI MANAGEMENT LLC,
d/b/a Red Rock Financial Services; SILVER
STATE TRUSTEE SERVICES, LLC,

4 Defendants.

5
6 Defendants LJS & G, LTD. d/b/a Leach Johnson Song and Gruchow, Anthem Highlands
7 Community Association, Nevada Association Services, Inc., RMI Management, LLC d/b/a Red
8 Rock Financial Services, K.G.D.O. Holding Company, Inc., d/b/a Terra West Property
9 Management, Heritage Square South Homeowners Association, Inc., Sierra Ranch Homeowners
10 Association, Cortez Heights Homeowners Association, Elkhorn Cimarron Estates Homeowners
11 Association, Mountain's Edge Master Association and Montecito at Mountain's Edge
12 ("Defendants") by and through their undersigned counsel, and Plaintiff BAC Home Loans
13 Servicing, LP by and through its counsel, hereby respectfully submit this Stipulation, Request
14 and Order Extending Time to Answer or Otherwise Respond to Plaintiff's Complaint (the
15 "Stipulation"). This Stipulation is made in accordance with LR 6-1, LR 6-2, and LR 7-1 of the
16 Local Rules of this Court. This is the First Request for an Extension of Time to File an Answer
17 or Otherwise Respond to Plaintiff's Complaint. Defendants were served with a copy of the
18 Summons and Complaint in this matter on February 2, 2011.

19 Upon agreement by and between all the parties hereto as set forth herein, the undersigned
20 respectfully request this Court grant an extension of time, up to and including March 23, 2011
21 for the above-referenced Defendants to file an answer or otherwise respond to Plaintiff's
22 Complaint. In addition, the parties respectfully request this Court to set a deadline of April 22,
23 2011 for Plaintiff to respond to any motions filed by the above-referenced Defendants.

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By entering into this Stipulation, none of the parties waive any rights they have under statute, law, or rule with respect to Plaintiff's Complaint.

Stipulated and Agreed to:

<p>AKERMAN SENTERFITT, LLP</p> <p><u>/s/Ariel E. Stern</u> Ariel E. Stern, Esq. Nevada Bar No. 8276 Diana S. Erb, Esq. Nevada Bar No. 10580 400 South Fourth Street, Suite 450 Las Vegas, Nevada 89101 Phone: (702)634-5000 <i>Attorneys for BAC Home Loans,</i></p> <p>DATED: February 23, 2011.</p>	<p>LEACH JOHNSON SONG & GRUCHOW</p> <p><u>/s/Sean Anderson</u> Sean Anderson Nevada Bar No. 7259 Ryan Reed Nevada Bar No. 11695 8945 West Russell Road, Suite 330 Las Vegas, Nevada 89148 Phone: (702) 538-9074 <i>Attorneys for LJS&G</i></p> <p>DATED: February 23, 2011.</p>
<p>LIPSON NEILSON COLE SELTZER & GARIN, P.C.</p> <p><u>/s/Kaleb Anderson</u> Kaleb Anderson, Esq. Nevada Bar No. 007582 9080 W. Post Rd. #100 Las Vegas, Nevada 89148 Phone: (702)382-1500 <i>Attorneys for Anthem Highlands</i></p> <p>DATED: February 23, 2011.</p>	<p>VILKIN P.C.</p> <p><u>/s/Richard Vilkin</u> Richard Vilkin, Esq. Nevada Bar No. 008301 1286 Crimson Sage Avenue Henderson, Nevada 89012 Phone: (702)476-3211 <i>Attorney for Nevada Association Services</i></p> <p>DATED: February 23, 2011.</p>
<p>MCDONALD CARANO WILSON LLP</p> <p><u>/s/George F. Ogilvie, III</u> George F. Ogilvie, III Esq. Nevada Bar No. 003552 2300 W. Sahara Avenue #1000 Las Vegas, Nevada 89102 Phone: (702)873-4100 <i>Attorney for K.G.D.O. Holding Company, Inc., d/b/a Terra West Property Management</i></p> <p>DATED: February 23, 2011.</p>	<p>WOLF RIFKIN SHAPIRO SCHULMAN & RABKIN, LLP</p> <p><u>/s/Don Springmeyer</u> Don Springmeyer, Esq. Nevada Bar No. 001021 3556 E. Russell Road, 2nd Floor Las Vegas, Nevada 89120 Phone: (702)341-5200 <i>Attorney for Sierra Ranch Homeowners Association, Cortez Heights HOA, Elkhorn Cimarron Estates, Mountain's Edge Master Association and Montecito at Mountain's Edge.</i></p> <p>DATED: February 23, 2011.</p>

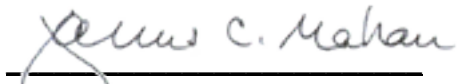
<p>RMI MANAGEMENT, INC. d/b/a RED ROCK FINANCIAL SERVICES</p> <p><u>/s/Christopher V. Yergensen</u> Christopher V. Yergensen, Esq. Nevada Bar No. 6183 1797 Mezza Court Henderson, Nevada 89012 Phone: (702)940-7110 Attorney for RMI d/b/a Red Rock Financial Services</p> <p>DATED: February 23, 2011.</p>	<p>HERITAGE SQUARE SOUTH HOMEOWNERS ASSOCIATION, INC.</p> <p><u>/s/Alan Johns</u> Alan Johns, Esq. Nevada Bar No. 1602 7331 W. Charleston Blvd. #110 Las Vegas, Nevada 89117 Phone: (702)258-4433 Attorney for Heritage Square South</p> <p>DATED: February 23, 2011.</p>
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ORDER

GOOD CAUSE APPEARING:

IT IS ORDERED that Defendants' request for an extension of time to answer or otherwise respond to Plaintiff's Complaint is granted, and said answer or response is due on or before March 23, 2011, with Plaintiff's Response to Motions due on or before April 22, 2011.

DATED this 8th day of April, 2011.


UNITED STATES DISTRICT JUDGE

LEACH JOHNSON SONG & GRUCHOW
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